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14 Attorneys for Defendant
15 CONSTELLATION WINES U.S., INC.

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA

18 UNITED STATES EQUAL EMPLOYMENT
19 OPPORTUNITY COMMISSION,

20 Plaintiff,

21 v.

22 CONSTELLATION WINES U.S., INC.
23 dba DUNNEWOOD VINEYARDS,

24 Defendant.

25 CASE NO. CV 11-04437 JSW

26 JOINT MOTION TO MODIFY
27 SCHEDULING ORDER;
DECLARATION; [PROPOSED] ORDER

28 Oral Argument Not Requested

29 Plaintiff UNITED STATES EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
30 (hereinafter "Commission" or "EEOC") and Defendant CONSTELLATION WINES U.S., INC dba
31 DUNNEWOOD VINEYARDS (hereinafter "Constellation"), through their respective counsel, hereby
32 jointly move for a modification of the Court's January 30, 2012 Order Scheduling Trial and Pretrial
33 Matters [Dkt. No. 24].

34 With the exception of a stipulation for additional time to conduct discovery prior to the Court

appointed ADR process, there has not been a prior modification of the Court's Scheduling Order in this case. As detailed in the accompanying Declaration, very good cause exists to grant the modification of the current Scheduling order.

On behalf of Plaintiff U.S. EEOC

On behalf of Defendant Constellation Wines U.S., Inc. dba Dunnewood Vineyards

Dated: July 10, 2012

Dated: July 10, 2012

U. S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION

KAUFMAN DOLOWICH VOLUCK & GONZO LLP

/s/ William R. Tamayo

William R. Tamayo, Regional Attorney

/s/ Elizabeth Williams

Elizabeth Williams
Attorney for Defendant

/s/ Jonathan T. Peck

Jonathan T. Peck

/s/ Raymond T. Cheung

Raymond T. Cheung, Senior Trial Attorney
Attorneys for Plaintiff U.S. EEOC

GENERAL ORDER 45 ATTESTATION

I, Raymond T. Cheung, am the ECF User whose ID and password are being used to file this Joint Motion to Modify Scheduling Order and [Proposed] Order. In compliance with General Order 45, X.B., I hereby attest that Elizabeth Williams has concurred in this filing.

Date: July 10, 2012

By:

/s/ Raymond T. Cheung

RAYMOND T. CHEUNG

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[Proposed] ORDER

GOOD CAUSE APPEARING THEREFORE, the Court's January 30, 2012 Scheduling Order
is hereby modified as follows:

Current Deadlines

New Deadlines

Jury Trial Date: 3/11/2013

4/1/2013

Pretrial Conference: 2/11/2013

3/4/2013

Last Day to Hear Dispositive Motions: 12/7/2012

1/25/2013

Last Day for Expert Discovery: 11/7/2012

12/26/2012

Close of Non-expert Discovery: 10/8/2012

11/26/2012

Further Case Management Conference: 10/12/2012

~~11/23/2012~~ 12/7/12

Joint Supplemental Case Management Statement due: 10/5/2012

~~11/16/2012~~ 11/30/12

IT IS SO ORDERED.

Dated: _____
July 11, 2012



HON. Jeffrey S. White
United States District Court Judge